

December 12, 2018

Elizabeth Adams, Acting Director
Air Division
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street, AIR-7
San Francisco, California 94105

Dear Ms. Adams:

The California Air Resources Board requests that the U.S. Environmental Protection Agency (U.S. EPA) concur that the documents accompanying this request support the flagging of PM₁₀ exceedances in the Imperial County Air Pollution Control District as natural or exceptional events due to high winds. The values recorded at the affected monitors have implications for the PM₁₀ nonattainment designation of the Imperial Valley Nonattainment Area.

The PM₁₀ exceedances occurred on:

- June 30, 2015
- July 8, 2015
- September 14, 2015
- October 1, 2015
- October 4, 2015
- November 2, 2015
- November 25, 2015
- December 14, 2015
- December 26, 2015

Unusually high PM₁₀ concentrations, exceeding the 24-hour National Ambient Air Quality Standard (NAAQS or standard) of 150 µg/m³, were recorded at various monitoring sites in the Imperial County Air Pollution Control District on the dates listed above. The analyses and data presented in the accompanying documents demonstrate that without the high winds and entrained dust on each of these occurrences, concentrations measured at the monitoring sites would have been below the federal standard.

On October 3, 2016, the U.S. EPA revised the *Treatment of Data Influenced by Exceptional Events* rule that allows data to be flagged and excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area (81 FR 68216). This rule requires that states submit documentation to support the initial flagging to the appropriate U.S. EPA Regional Office.

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If you have any questions regarding the enclosed documentation please contact Mr. Webster Tasat, Manager, Central Valley Air Quality Planning Section, at (916) 323-4950 or via email at webster.tasat@arb.ca.gov.

Sincerely,



Dr. Michael Benjamin, Chief
Air Quality Planning and Science Division

Enclosure

cc: (without enclosure)

Mr. Matt Dessert
Air Pollution Control Officer
Imperial County Air Pollution Control District
150 South Ninth Street
El Centro, California 92243-2850

Ms. Gwen Yoshimura, Manager
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